

UNITED STATES DISTRICT COURT, DISTRICT OF MASSACHUSETTS

_____	)	
CAPITOL RECORDS, INC., ET AL	)	
Plaintiffs,	)	
	)	Civ. Action No. 04-40168-FDS
v.	)	
	)	
JIM FITZPATRICK,	)	
Defendant.	)	
_____	)	

AFFIDAVIT IN SUPOORT OF SANOFI-AVENTIS GROUP'S MOTION FOR ENTRY OF PROTECTIVE ORDER

I, Jason Steinhart, hereby depose and state as follows:

1. I am employed by Aventis, Inc., which is an affiliate of the sanofi-aventis Group ("SAG") as Assistant General Counsel. I am familiar with the above-captioned litigation and have been involved in the discovery process, however, some of the information contained herein has been made available to me by others.

2. Jim Fitzpatrick is a SAG sales representative.

3. SAG issued Fitzpatrick a laptop computer. The laptop contains confidential business information of SAG, including information regarding Fitzpatrick's sales efforts, as well as proprietary information regarding SAG's products and business (hereinafter, "the Confidential Business Information").

4. SAG protects from disclosure, and continues to protect from disclosure, the Confidential Business Information. Release of that information to the public - and particularly to SAG's competitors - would harm SAG's business and competitive position.

Signed under the pains and penalties of perjury this 14 day of July, 2005.

